

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO.: 2:21-341

-versus-

GENO CURTIS WHITE, JR.
EBONY WILLIAMS

EMILY MOORE

JESUS WILSON-LOMBIDA

21 U.S.C. § 846

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(A)

21 U.S.C. § 841(b)(1)(B)

21 U.S.C. § 841(b)(1)(C)

18 U.S.C. § 922(g)(1)

18 U.S.C. § 924(a)(2)

18 U.S.C. § 924(c)(1)(A)

18 U.S.C. § 924(d)(1)

18 U.S.C. § 924(e)

21 U.S.C. § 853.

21 U.S.C. § 881

21 U.S.C. § 802(57)

21 U.S.C. § 802(58)

28 U.S.C. § 2461(c)

**INDICTMENT
(SEALED)**

COUNT 1

THE GRAND JURY CHARGES:

That beginning at a time unknown to the Grand Jury, but beginning in at least the Spring of 2019, and continuing thereafter, up to and including the date of this Indictment, in the District of South Carolina and elsewhere, the Defendants, [REDACTED]

[REDACTED] **GENO CURTIS WHITE, JR., EBONY**
WILLIAMS, [REDACTED] **EMILY MOORE,** [REDACTED]

[REDACTED]

[REDACTED] **JESUS WILSON-**
LOMBIDA, [REDACTED] knowingly

and intentionally did combine, conspire, agree and have tacit understanding with each other and with others, both known and unknown to the Grand Jury, to possess with intent to distribute and to distribute N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide (commonly known as "fentanyl"), methamphetamine, and cocaine, all Schedule II controlled substances, and heroin, a Schedule I controlled substance,

a.

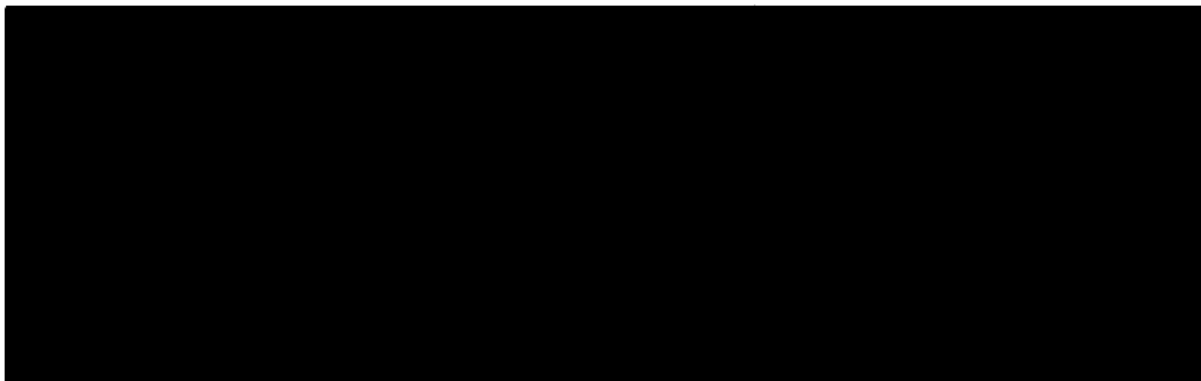
[REDACTED]

- b. With respect to **GENO CURTIS WHITE, JR.**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propanamide (commonly known as

“fentanyl”), 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, 5 kilograms or more of cocaine, and 1 kilogram or more of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);

- c. With respect to **EBONY WILLIAMS**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, 500 grams or more of cocaine, and 1 kilogram or more of heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(B);

d.



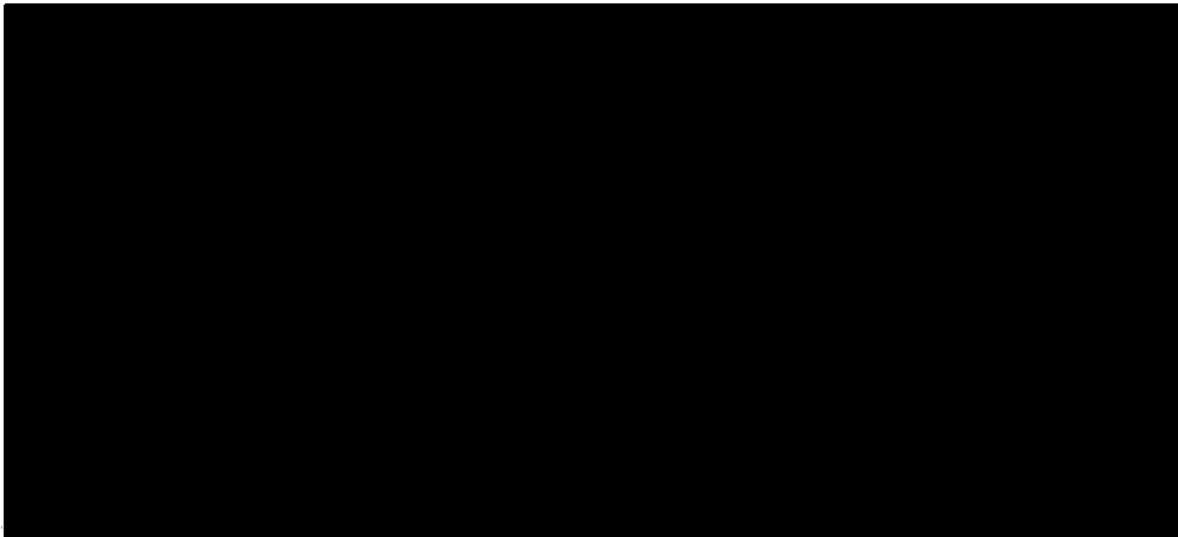
- e. With respect to **EMILY MOORE**, the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);

- f. With respect to [REDACTED] the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as "fentanyl"), and 1 kilogram or more of heroin, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- g. With respect to [REDACTED] the amount involved in the conspiracy attributable to her as a result of her own conduct, and the conduct of other conspirators reasonably foreseeable to her, is 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as "fentanyl"), in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- h. With respect to [REDACTED] the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as "fentanyl"), in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- i. With respect to [REDACTED] the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as "fentanyl"), and a quantity of cocaine, in violation of Title 21, United States Code,

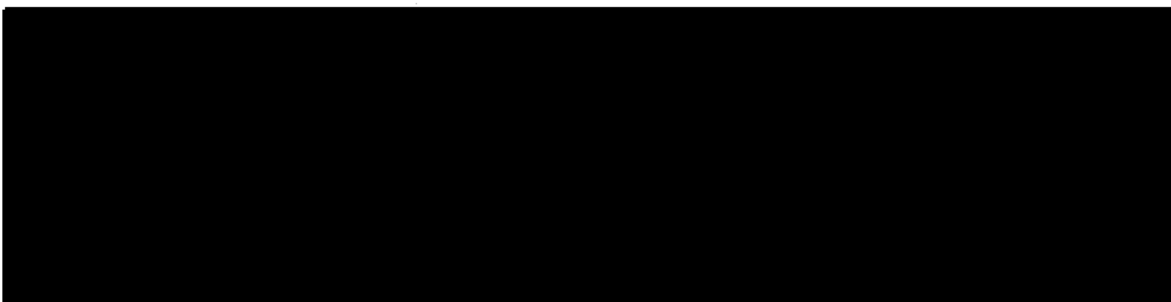
Sections 841(a)(1), 841(b)(1)(A), and 841(b)(1)(C);

- j. With respect to **JESUS WILSON-LOMBIDA**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);

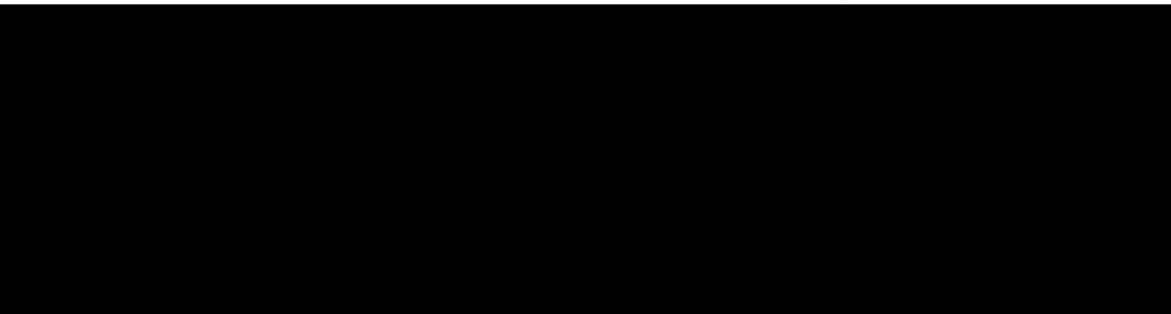
k.



l.



m.





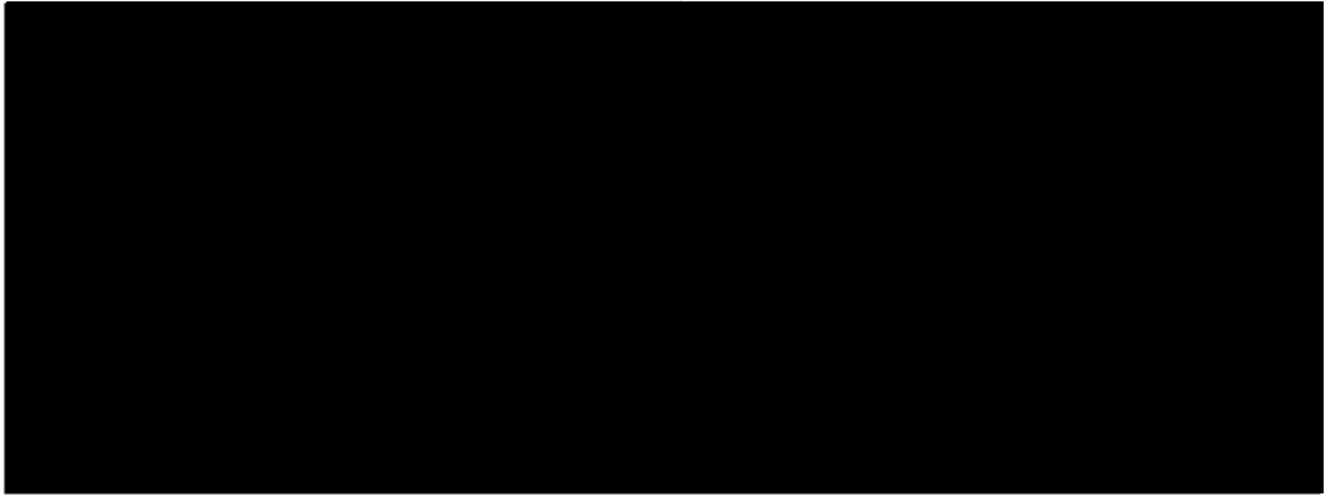
COUNT 2

THE GRAND JURY FURTHER CHARGES:



COUNT 3

THE GRAND JURY FURTHER CHARGES:



COUNT 4

THE GRAND JURY FURTHER CHARGES:

That on or about August 11, 2020, in the District of South Carolina, the Defendant, **EMILY MOORE**, knowingly, intentionally, and unlawfully did possess with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT 5

THE GRAND JURY FURTHER CHARGES:

That on or about November 14, 2020, in the District of South Carolina, the Defendant, **EBONY WILLIAMS**, knowingly, intentionally, and unlawfully did possess with intent to distribute 500 grams or more of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 6

THE GRAND JURY FURTHER CHARGES:

That on or about November 14, 2020, in the District of South Carolina, the Defendant, **GENO CURTIS WHITE, JR.**, knowingly, intentionally, and unlawfully did possess with intent to distribute 500 grams or more of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 7

THE GRAND JURY FURTHER CHARGES:

That on or about November 14, 2020, in the District of South Carolina, the Defendant, **GENO CURTIS WHITE, JR.**, knowingly did possess ammunition in and affecting commerce, that is 9mm ammunition, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, and knowing that he had been convicted of such a crime;

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 924(e).

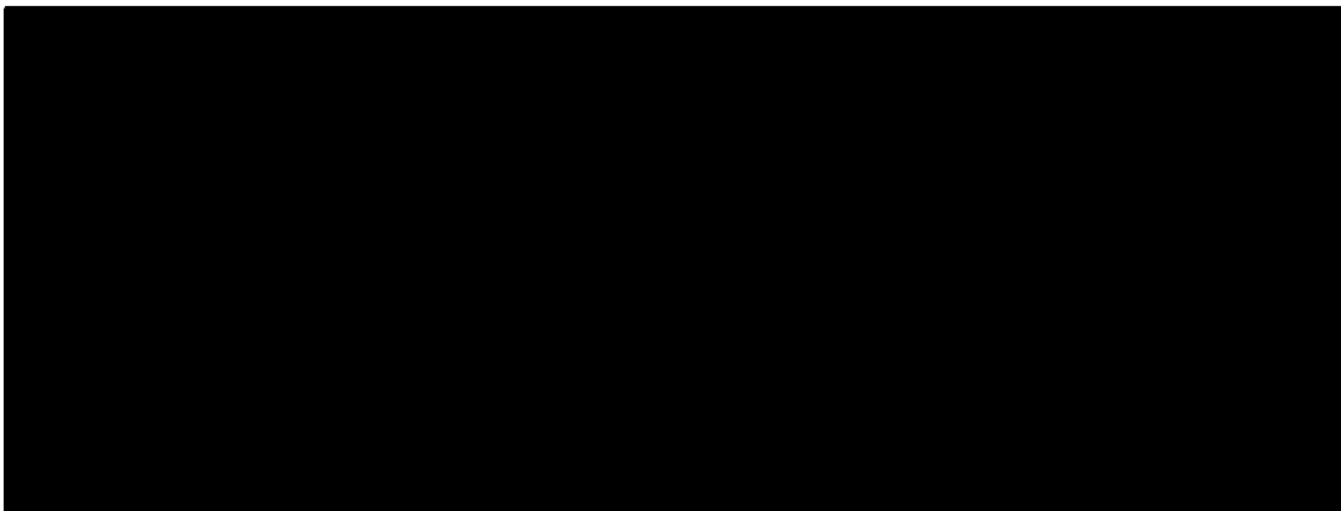
COUNT 8

THE GRAND JURY FURTHER CHARGES:



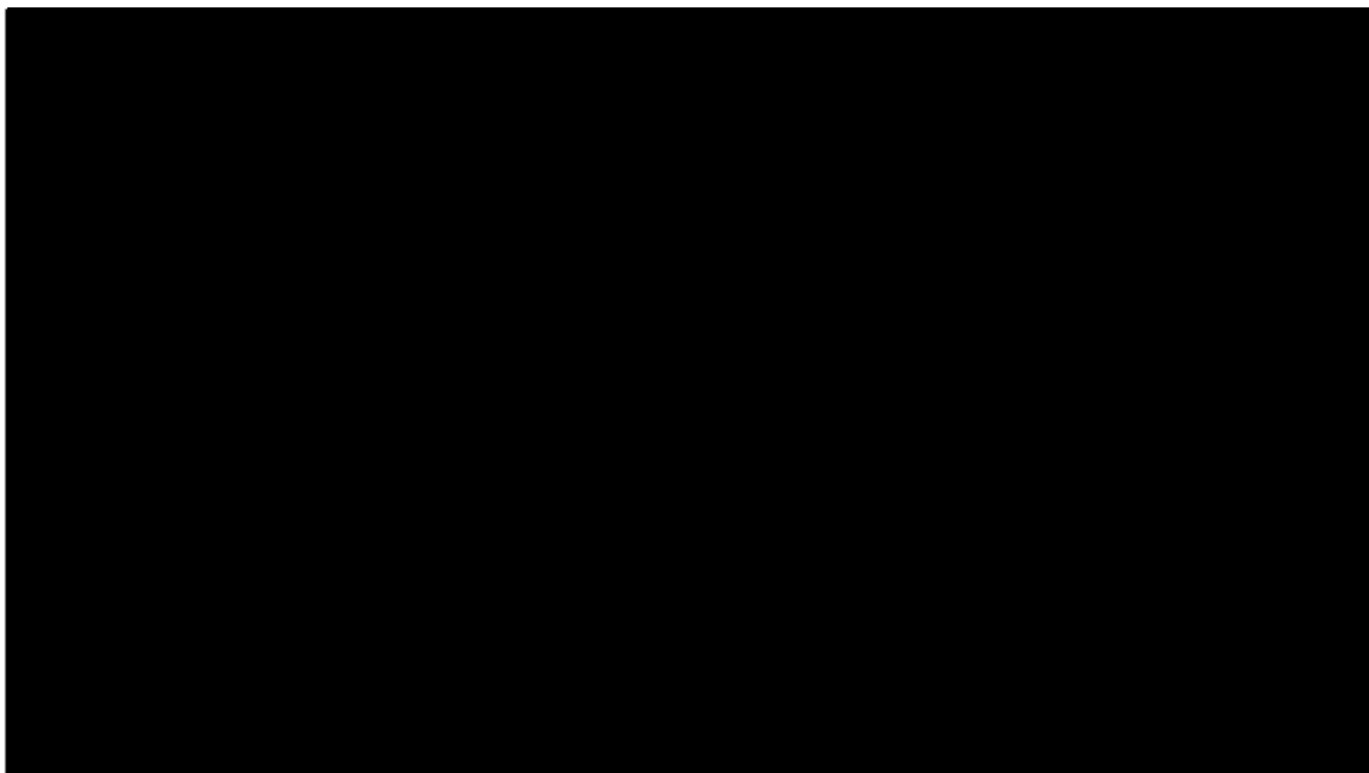
COUNT 9

THE GRAND JURY FURTHER CHARGES:



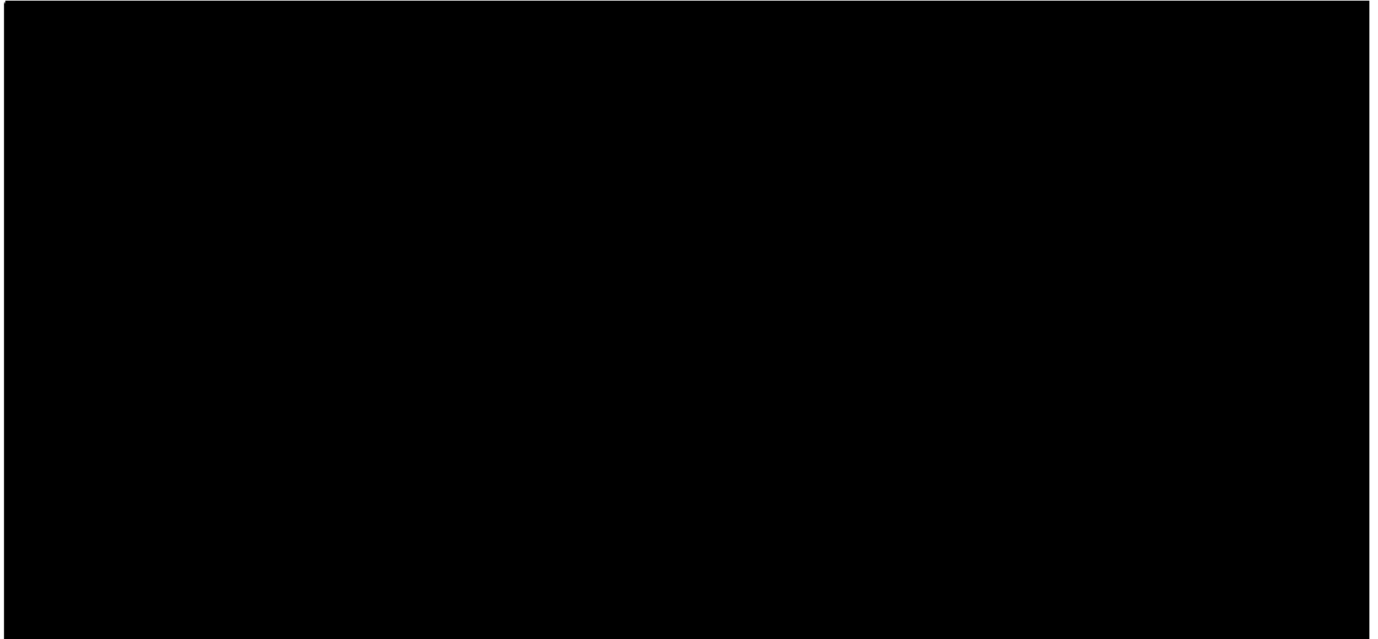
COUNT 10

THE GRAND JURY FURTHER CHARGES:



COUNT 11

THE GRAND JURY FURTHER CHARGES:



COUNT 12

THE GRAND JURY FURTHER CHARGES:

That on or about June 1, 2021, in the District of South Carolina, the Defendant, **JESUS WILSON-LOMBIDA**, knowingly, intentionally, and unlawfully did possess with intent to distribute 400 grams or more of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (commonly known as “fentanyl”), a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

FORFEITURE ALLEGATION

FIREARM/DRUG-TRAFFICKING OFFENSES:

Upon conviction for felony violation of Title 18 and 21, United States Code as charged in this Indictment, the Defendants, [REDACTED]

GENO CURTIS WHITE, JR., EBONY WILLIAMS, [REDACTED]

EMILY MOORE, [REDACTED]

WILSON-LOMBIDA, [REDACTED]

JESUS

shall

forfeit to the United States all of the Defendants' rights, title and interest in and to any property, real and personal,

- (a) constituting, or derived from any proceeds the Defendants obtained, directly or indirectly, as the result of such violation(s) of Title 21, United States Code, and all property traceable to such property;
- (b) used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation of Title 21, United States Code;
- (c) any firearms and ammunition (as defined in 18 U.S.C. § 921) –
 - (1) used or intended to be used to facilitate the transportation, sale, receipt, possession or concealment of controlled substances or any proceeds traceable to such property;
 - (2) involved in or used in any knowing violation of 18 U.S.C. §§ 922 and 924, or violation of any other criminal law of the United States, or intended to be used in a crime of violence;

PROPERTY:

Pursuant to Title 18, United States Code, 924(d)(1), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for the offenses charged in this Indictment includes,

but is not limited to, the following:

A. Firearms:

1. Glock, model 19, 9mm handgun with magazine
(Serial Number: BKHU726)
Asset ID: 21-DEA-671783

2.

3.

B. Proceeds/Forfeiture Judgment:

A sum of money equal to all property the Defendants obtained as a result of the drug offenses charged in the Indictment, and all interest and proceeds traceable thereto as a result for their violation of Title 21 United States Code.

C. Cash/United States Currency:

1.

2.

3.

4. \$58,179.00 in United States currency seized from **GENO CURTIS WHITE, JR.**
Asset ID: 21-DEA-6711955

SUBSTITUTION OF ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act

or omission of the Defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the Defendants up to an amount equivalent to the value of the above-described forfeitable property;

Pursuant to Title 18, United States Code, 924(d)(1), Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c).

SENTENCING ENHANCEMENT PROVISIONS

THE GRAND JURY FURTHER CHARGES:

The Defendant, [REDACTED]

GENO CURTIS WHITE, JR., and **JESUS WILSON-LOMBIDA**, prior to committing the violation(s) contained in this Indictment, had the following conviction(s) for serious drug felon(ies) and/or for serious violent felon(ies), pursuant to Title 21, United States Code, Sections 802(57) and (58), that had become final for the purposes of Title 21, United States Code, Section 841:

1. [REDACTED]

2. GENO CURTIS WHITE, JR.

- a. October 31, 2014 – a conviction for a serious drug felony in the District South Carolina, CMECF 2:13-cr-00919, for which the Defendant served more than 12 months in prison and for which the Defendant was released within 15 years of the commencement of the offense charged in Count 1 of this Indictment.

3. JESUS WILSON-LOMBIDA

- a. September 21, 2010 – a conviction for a serious drug felony in the State of Minnesota, 24CR082997, for which the Defendant served more than 12 months in prison and for which the Defendant was released within 15 years of the commencement of the offense charged in Count 1 of this Indictment.

All in violation of Title 21, United States Code, Sections 802, 841, and 851.

A Ine Bill BILL



FOREPERSON

M. Rhett Dehart
M. RHETT DEHART (jls)
ACTING UNITED STATES ATTORNEY